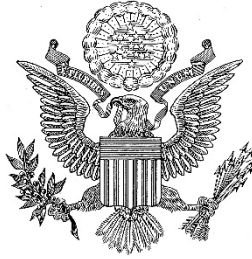


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First Assistant

March 19, 2024

Honorable Mae A. D'Agostino
United States District Court Judge
U.S. Federal Courthouse
445 Broadway
Albany, New York 12207

Re: United States v. Dionisio Figueroa
Case No. 23-cr-0161-MAD

Dear Judge D'Agostino:

I am writing to request permission to file a sentencing memorandum in excess of the Court's 10-page limit in the scheduling order filed following the jury verdict in this case. We have prepared a sentencing memorandum of approximately 25 pages and move for leave to file an overlength submission. The length was the result of a number of factors. This was anything but a typical case. The combination of the trial record, Mr. Figueroa's history and characteristics, the novelty of some of the issues, the number of people who have reached out to support him, and issues in the PSR that are still in dispute, among other issues, we believe justifies a memorandum that is longer than is customary in a garden-variety case. As always, we thank the Court for its consideration.

Respectfully submitted,

/s/ *Jeremy B. Sporn*
Jeremy B. Sporn

cc: AUSA Frank Balsamello

IT IS SO ORDERED:

Mae A. D'Agostino
Mae A. D'Agostino
U.S. District Judge

Dated: 3/21/24
Albany, NY